

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ORIGINAL

- - - - -	X	
	:	
UNITED STATES OF AMERICA	:	<u>INDICTMENT</u>
	:	
- v. -	:	15 Cr. 33
	:	
KRIS SERGENTAKIS,	:	
	:	
Defendant.	:	
- - - - -	X	

COUNT ONE
(Witness Retaliation)

The Grand Jury charges:

1. Between in or about 2007 and in or about December 2014, in the Southern District of New York and elsewhere, KRIS SERGENTAKIS, the defendant, knowingly, with the intent to retaliate, took actions harmful to a person, including interference with the lawful employment or livelihood of such person, for providing to a law enforcement officer truthful information relating to the commission or possible commission of a federal offense, to wit, SERGENTAKIS harassed and threatened, through letters, emails, and the Internet, a person ("Victim-1") who previously provided information to law enforcement officers relating to SERGENTAKIS's commission of federal offenses.

(Title 18, United States Code, Section 1513(e).)

COUNT TWO
(Cyberstalking)

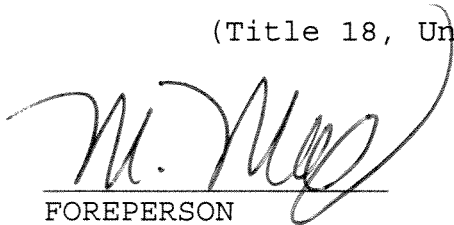
The Grand Jury further charges:

2. Between in or about 2007 and on or about October 1, 2013, in the Southern District of New York and elsewhere, KRIS SERGENTAKIS, the defendant, with the intent to injure, harass, and place under surveillance with intent to injure, harass, and intimidate, and cause substantial emotional distress to a person in another State, and to place a person in another State in reasonable fear of the death of, or serious bodily injury to, that person, a member of the immediate family of that person, and a spouse or intimate partner of that person, did use the mail, an interactive computer service, and a facility of interstate or foreign commerce to engage in a course of conduct that caused substantial emotional distress to that person and placed that person in reasonable fear of the death of, or serious bodily injury to, that person, a member of the immediate family of that person, and a spouse or intimate partner of that person, to wit, SERGENTAKIS used interstate facilities, namely the mail and the Internet, to disseminate harassing and threatening messages regarding Victim-1, residing in another State, causing substantial emotional distress to Victim-1.


3. Between on or about October 1, 2013 and in or about December 2014, in the Southern District of New York and elsewhere, KRIS SERGENTAKIS, the defendant, with the intent to

injure, harass, intimidate, and place under surveillance with intent to injure, harass, and intimidate another person, did use the mail, an interactive computer service or electronic communication service or electronic communication system of interstate commerce, and any other facility of interstate or foreign commerce to engage in a course of conduct that placed such person in reasonable fear of the death of or serious bodily injury to that person, an immediate family member of that person, and a spouse or intimate partner of that person, and caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to that person, an immediate family member of that person, and a spouse or intimate partner of that person, to wit, SERGENTAKIS used interstate facilities, namely the mail and the Internet, to disseminate harassing and threatening messages regarding Victim-1, causing substantial emotional distress to Victim-1 and Victim-1's spouse.

(Title 18, United States Code, Section 2261A(2).)



FOREPERSON



PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

KRIS SERGENTAKIS,

Defendant.

INDICTMENT

15 Cr.

(18 U.S.C. §§ 1513(e) & 2261A(2).)



Foreperson.

PREET BHARARA

United States Attorney.

11/20/15 Indictment Filed

Dawson